

July 20, 2021

Georgia Occupational Regulation Review Council
2 Capitol Square
Atlanta, GA 30334

RE: H.B. 412

Dear Members of the Occupational Review Council:

On behalf of the American Speech-Language-Hearing Association, I write to comment on H.B. 412, which would allow the licensure of individuals providing applied behavior analysis (ABA) services, including those associated with the treatment of autism spectrum disorder. As written, this legislation impedes the ability of licensed audiologists and speech-language pathologists to assess and treat communication disorders for individuals with autism spectrum disorder.

The American Speech-Language-Hearing Association (ASHA) is the national professional, scientific, and credentialing association for 218,000 members and affiliates who are audiologists; speech-language pathologists; speech, language, and hearing scientists; audiology and speech-language pathology support personnel; and students. Over 5,400 ASHA members reside in Georgia.¹

Autism spectrum disorder (ASD) is a complex neurobiological disorder characterized by social impairment, communication difficulties, and repetitive and stereotyped behaviors for which speech-language pathologists (SLPs) play a critical role in assessing and treating. Social interaction and communication, speech production, understanding, and using spoken and written language are examples of neurodevelopmental functions. They are not solely "behaviors."

ASHA maintains that SLPs should be included in any comprehensive assessment and treatment for individuals with ASD since SLPs are able to prioritize intervention objectives and coordinate planning for communicative success. While ABA therapists may work on an individual's behaviors, SLPs have the educational background that enables them to focus on understanding and using language, social communication, literacy, speech production, and augmentative and alternative communication.

Individuals with communication disorders, and their families, must be provided with a full complement of services designed to meet their individual needs. Allowing individuals without the appropriate education and training to make assessment decisions about an individual's communication needs may result in an inaccurate assessment and inappropriate recommendations for services to the family. Utilizing a team of qualified professionals including physicians, mental health professionals, SLPs, ABA therapists, and others will ensure that an individual diagnosed with ASD receives a comprehensive assessment and the full complement of services necessary to meet their unique needs.

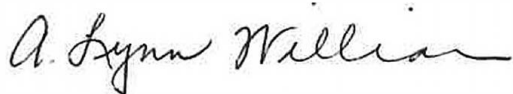
To address these concerns, ASHA has proposed the following amendments to H.B. 412:

- In section 43-7A-2 (as revised), add communication assessment and treatment to the list of services that are not the practice of ABA.

- In section 43-7A-7 (as revised), add audiologists and speech-language pathologists to the list of providers that the Act would not apply to.

Thank you for your consideration of ASHA's recommended amendments to H.B. 412. If you or your staff have any questions, please contact Tim Boyd, ASHA's director of state health care and education affairs, at tboyd@asha.org.

Sincerely,

A handwritten signature in cursive script that reads "A. Lynn Williams".

A. Lynn Williams, PhD, CCC-SLP
2021 ASHA President

¹ American Speech-Language-Hearing Association. (2020). *Georgia* [Quick Facts].
<https://www.asha.org/siteassets/uploadedfiles/Georgia-State-Flyer.pdf>